

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of Daniel Snyder
for an Order Directing Discovery from
The Ardent Group, LLC Pursuant to
28 U.S.C. § 1782

Misc. Action No. _____

***Ex Parte* Petition for Assistance in Aid of
a Foreign Proceeding Pursuant to
28 U.S.C. § 1782**

DECLARATION OF JORDAN W. SIEV

I, Jordan W. Siev, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Reed Smith LLP, attorneys of record for petitioner Daniel Snyder (“Petitioner” or “Mr. Snyder”) in this matter.

2. I am fully familiar with the facts and circumstances set forth herein and submit this Declaration in support of Mr. Snyder’s *Ex Parte* Petition, pursuant to 28 U.S.C. § 1782, for assistance in aid of a foreign proceeding.

3. Attached hereto as **Exhibit A** is a true and correct copy of the subpoena for the production of documents that Petitioner seeks to serve on respondent The Ardent Group, LLC.

4. Attached hereto as **Exhibit B** is a true and correct copy of the deposition subpoena that Petitioner seeks to serve on The Ardent Group, LLC.

5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the Precision Creations LLC website, appearing at <https://www.precisioncreations.com/>, which I caused to be downloaded.

6. Attached hereto as **Exhibit D** is a true and correct copy of the original Wayne Dupree article, appearing at <https://www.waynedupree.com/2020/07/dan-snyder-epstein-redskins-sex-traffic/>, which I caused to be downloaded.

7. Attached hereto as **Exhibit E** is a true and correct copy of the LifeZette reposted article, appearing at <https://www.lifezette.com/2020/07/internet-sleuths-accuse-redskins-owner-dan-snyder-of-sex-trafficking-and-epstein-ties-after-wapo-bombshell-drops/>, which I caused to be downloaded.

8. Attached hereto as **Exhibit F** is a true and correct copy of an excerpt from the Drew Berquist website, appearing at <https://www.drewberquist.com/2020/07/internet-sleuths-accuse-redskins-owner-dan-snyder-of-sex-trafficking-and-epstein-ties-after-wapo-bombshell-drops>, which I caused to be downloaded.

9. Attached hereto as **Exhibit G** is a true and correct copy of an excerpt from the Rob Maness website, appearing at <https://www.robmaness.com/2020/07/internet-sleuths-accuse-redskins-owner-dan-snyder-of-sex-trafficking-and-epstein-ties-after-wapo-bombshell-drops/>, which I caused to be downloaded.

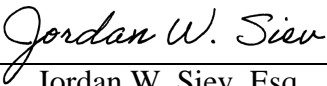
10. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt from the Steve Gruber website, appearing at <https://www.stevegruber.com/2020/07/internet-sleuths-accuse-redskins-owner-dan-snyder-of-sex-trafficking-and-epstein-ties-after-wapo-bombshell-drops/>, which I caused to be downloaded.

11. Attached hereto as **Exhibit I** is a true and correct copy of relevant excerpts from Respondent's website, <https://theardent.group/>, which I caused to be downloaded.

12. Attached hereto as **Exhibit J** is a true and correct copy of the document commencing the litigation currently pending in The Court of the Hon'ble High Court of Delhi, bearing the caption *Daniel Snyder Through his SPA Holder vs. Eleven Internet Services LLP & Ors.*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of September, 2020 at New York, New York.



Jordan W. Siev, Esq.